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Attorneys for National Labor Relations Board, Petitioner

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

CHRISTY J. KWON, Regional Director of  
Region 32 of the National Labor Relations  
Board, for and on behalf of the NATIONAL  
LABOR RELATIONS BOARD,

Petitioner,

vs.

AAA NORTHERN CALIFORNIA, NEVADA  
& UTAH

Respondent

Case No. 4:24-CV-07978-HSG

**STIPULATION AND ORDER TO  
EXCEED PAGE LIMITS**

American Automobile Association of Northern California, Nevada, & Utah  
(Respondent) and Christy J. Kwon, Regional Director of Region 32 of the National Labor

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1 Relations Board, for and on behalf of the National Labor Relations Board (Petitioner), pursuant  
2 to Civil Local Rule 7-12, hereby stipulate and agree as follows:

3 WHEREAS, on November 14, 2024, Petitioner filed with this Honorable Court a Petition  
4 for Temporary Injunction Under Section 10(j) of the National Labor Relations Act, as Amended  
5 [29 U.S.C. Section 160(j)];  
6

7 WHEREAS, on November 18, 2024, Petitioner filed with this Honorable Court a  
8 Memorandum of Points and Authorities in Support of said Petition;

9 WHEREAS Petitioner's November 18, 2024, Memorandum of Points and Authorities  
10 exceeds the page limitations contained in Civil Local Rule 7-2(b);  
11

12 WHEREAS Respondent anticipates that its Opposition to the Petition and supporting  
13 Memorandum of Points and Authorities will likewise exceed the page limitations contained in  
14 Civil Local Rule 7-2(b);

15 WHEREAS the Parties agree that the legal issues placed in issue by said Petition are  
16 numerous enough to require written argument beyond that which is possible under the page  
17 limitations contained in Civil Local Rule 7-2(b).  
18

19 IT IS HEREBY STIPULATED by and between the Parties through their respective  
20 counsel that Petitioner's Memorandum of Points and Authorities in support of said Petition may  
21 exceed the page limitations contained in Civil Local Rule 7-2(b), and be accepted by this  
22 Honorable Court as submitted; and  
23

24 IT IS FURTHER STIPULATED by and between the Parties through their respective  
25 counsel that Respondent's Opposition to the Petition and supporting Memorandum of Points and  
26 Authorities may exceed the page limitations contained in Civil Local Rule 7-2(b) by a number  
27

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of pages comparable to (i.e., within five pages) the number of excess pages submitted by  
Petitioner in her Memorandum of Points and Authorities.

Date: November 18, 2024

s/Amanda M. Brunt

AMANDA BRUNT  
Counsel for Petitioner  
National Labor Relations Board, Region 32  
1301 Clay Street, Suite 1510N  
Oakland, CA 94612

Date: November 18, 2024

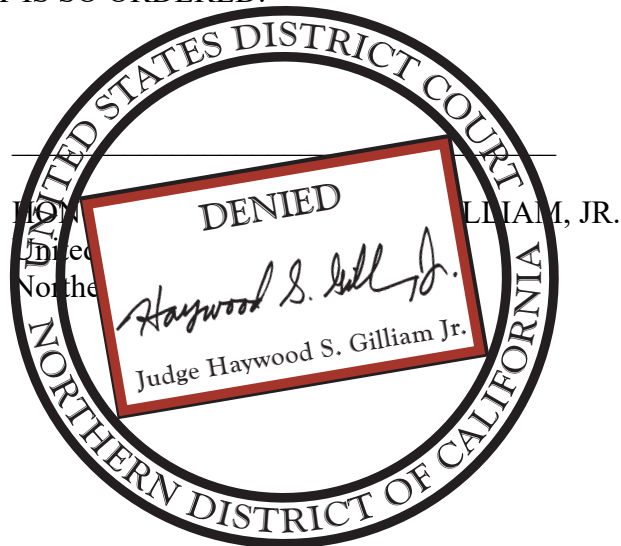
s/Thomas J. Posey

THOMAS J. POSEY  
Counsel for Respondent  
Seyfarth Shaw, LLP  
601 South Figueroa Street, Suite 3300  
Los Angeles, CA 90017-5793

I hereby attest, under penalty of perjury under the laws of the United States of America, that on  
November 18, 2024, Counsel for Respondent Thomas J. Posey concurred in the filing of this  
document. s/Amanda Brunt Dated: November 18, 2024

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Date: 11/19/2024



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